



December 19, 2002

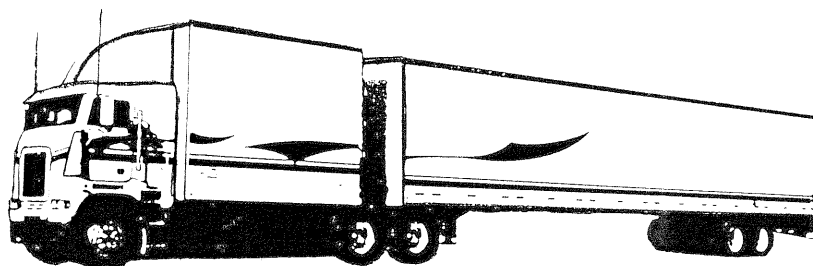
U.S. Department of Transport  
Dockets Management Facility  
Room PL-401  
400 Seventh Street, SW  
Washington, D.C. 20590-0001

**Re: Designation of Dromedary Equipped Truck Tractor-Semi Trailers  
as Specialized Equipment**

Extreme Transportation Ltd. is a Canadian motor carrier that utilizes dromedary equipped truck tractor-semi trailer combinations primarily for the transportation of lightweight freight into the western and mid-western United States. Not only does Extreme Transportation support the proposal, which requires that all states allow these combinations up to an overall length of 75 feet when carrying munitions for the U.S. DOD, it further supports the notion that this 75 foot length restriction should apply to *all* dromedary equipped vehicles.

Extreme Transportation has found this type of unit to be an efficient carrier of such lightweight cargo as fiberglass insulation, styrofoam, empty beverage containers (plastic milk jugs and aluminum softdrink cans), and plastic shampoo bottles. With an overall length restriction of 75 feet, the dromedary combination can hold 23% more cargo by volume than a conventional tractor-semi trailer combination with the same 75 foot overall length restriction (see attached diagrams). Effectively, the increase in cargo carrying capacity reduces the number of combination units on the roadway (four dromedary combinations can carry the equivalent of five conventional semi-trailer units), thereby reducing traffic levels, fuel consumption, emissions, and safety concerns.

Mr. T.D. Larson's April 20, 1992 letter (found at the U.S. DOD's supplemental submission) outlines the plight of the dromedary unit since the enactment of the *Surface Transportation Assistance Act* of 1982 (STAA). At that time it was quite clearly anticipated that dromedary units would become obsolete and, in fact, a grandfathering clause was created to allow the existing fleet to wear out in the ordinary course.



Subsequently, the *Intermodal Surface Transportation Efficiency Act* of 1991 (ISTEA) came into force, applying to vehicles on the National Highway Network. The Federal Register of June 13, 1994, notes:

Dromedary equipped semitrailer combinations are a minor segment of the industry which probably escaped the notice of Congress [when ISTEA was enacted]...

A number of exceptions have been created to allow the continued use of dromedary units. Particularly dromedaries may be used:

- a. in a "maxi-cube" configuration, where the dromedary box is accessed through the semi-trailer for the purpose of loading and unloading;
- b. for car carrying and boat carrying units (and, in California, camper carrying units) – with a dromedary deck rather than box;
- c. in California, for the "motorsports" industry, through the issuing of a special permit.

And now, it appears, the units may also be used for the transportation of munitions for the Department of Defense.

When the decision was made in 1982 to effectively phase out dromedary units, those units were typically loaded and unloaded through side doors via ramps. Extreme Transportation uses a patented dromedary unit (called the "Accomplice") that, when the semi-trailer is removed, slides to the back of the tractor unit. This allows the tractor to be backed up to a loading bay, where the dromedary unit is then loaded or unloaded through a rear door. This is a system that overcomes some of the earlier difficulties with dromedary units.

Extreme Transportation is actively using these dromedary units, in a 75' length truck tractor-semi trailer combination. It finds, though, that there is a patchwork of inconsistent state laws that apply to these units. For example:

- a. the units are permissible, without a permit, in Washington, Oregon, Montana, Wyoming, North Dakota, South Dakota, Colorado, Nevada, Louisiana, and Arizona;
- b. the units are permissible in Utah and Idaho, but only through the purchase of an extended length permit;
- c. the units may travel in Texas only if empty and with an over-dimensional permit;
- d. the units may travel in New Mexico with an over-dimensional permit, but only during daylight hours and with "long load" signs on the front and rear; and
- e. the units are not permissible in California, Tennessee, Kansas, and Florida.

Several years ago one of Extreme's units was put on display at a truck show in Las Vegas, where it received a great deal of interest. The greatest interest came from carriers and shippers in the State of California. (A national food manufacturer operates over 100 dromedary units with a 65' overall length in California. It is intending to phase these out, however, as there is no advantage over conventional tractors pulling 53' semi trailers.)

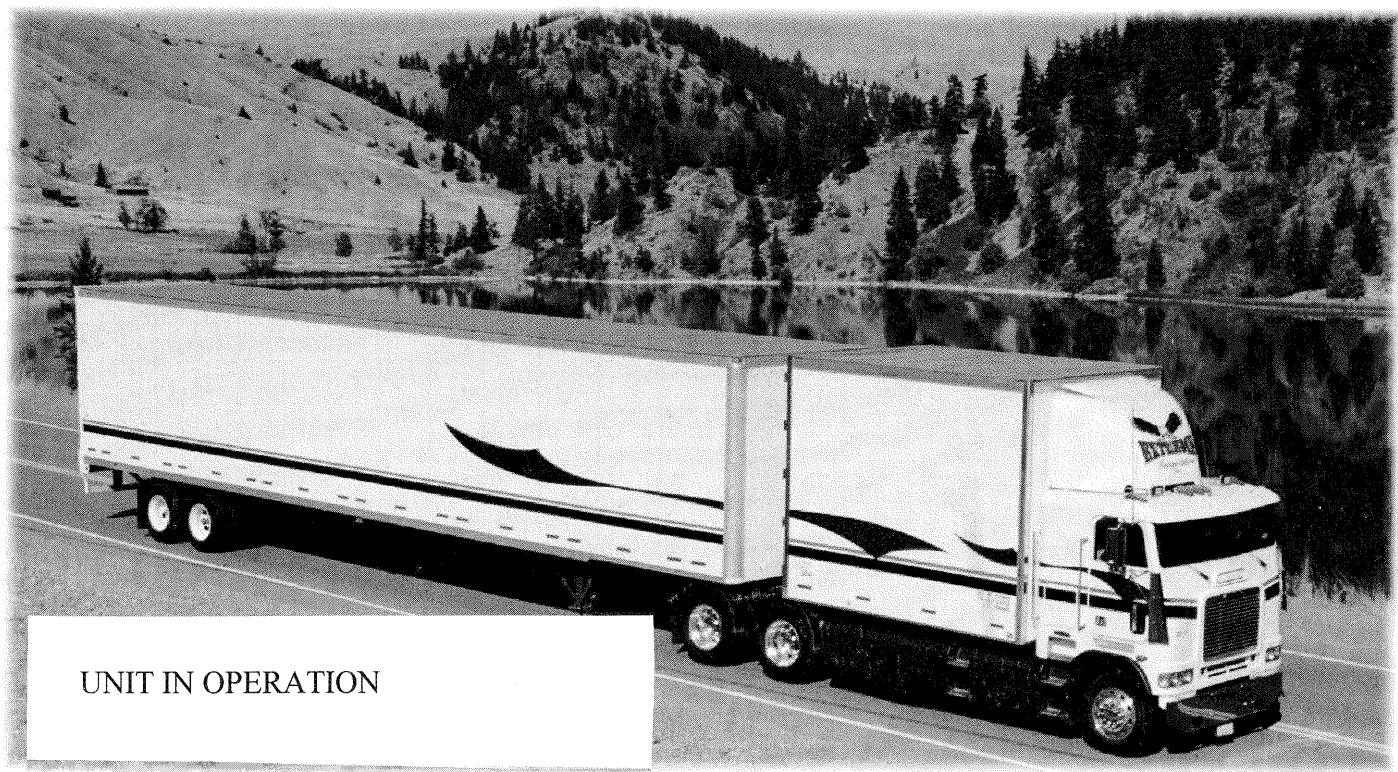
Extreme Transportation argues that the advantages of a 75 foot dromedary combination for lightweight cargo have been demonstrated, with no disadvantages having been shown. It urges a sweeping change to the regulations, not only for munitions but also generally for high-volume, lightweight freight.

Yours truly,

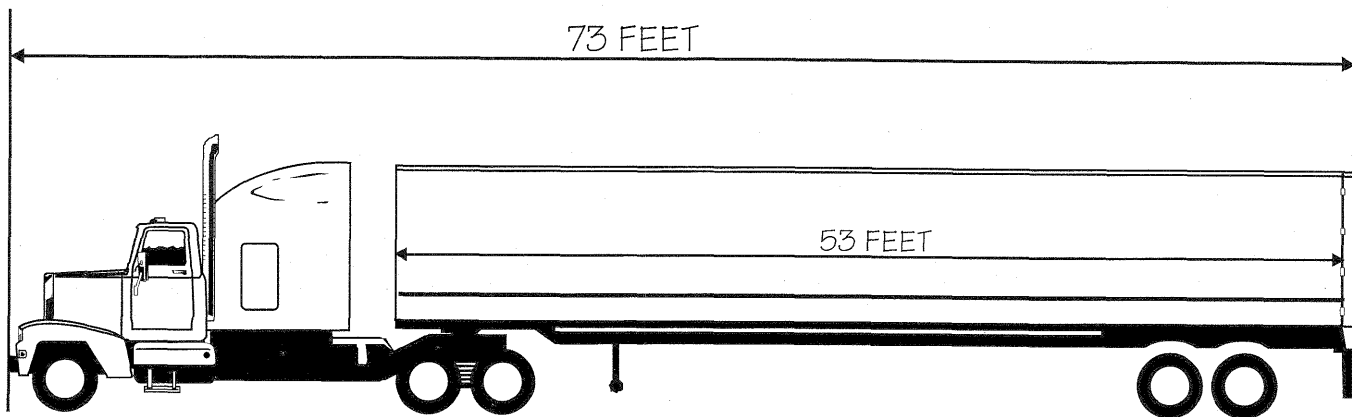
**EXTREME TRANSPORTATION INC.**

A handwritten signature in dark ink, appearing to read 'Larry Hall', with a large, sweeping loop at the beginning.

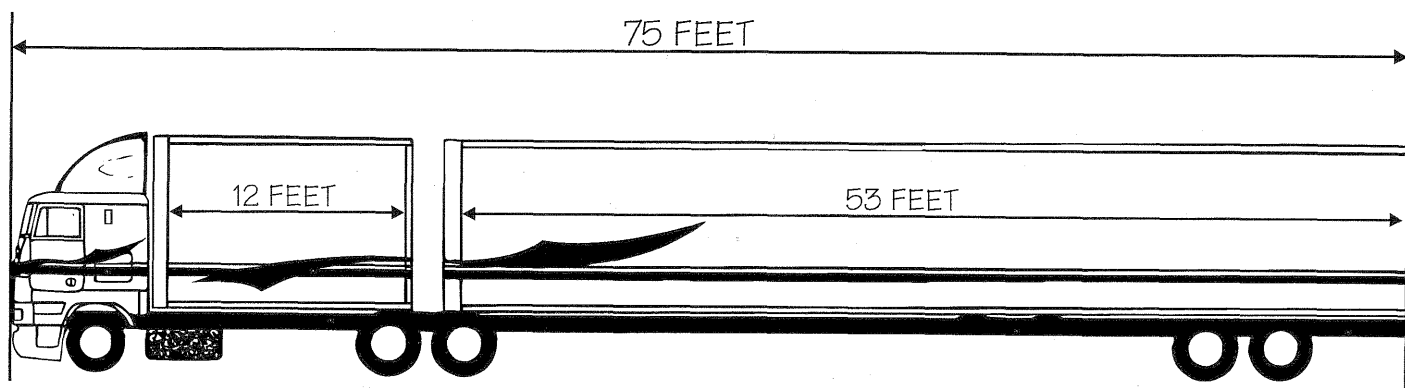
**LARRY HALL, President**



UNIT IN OPERATION



CONVENTIONAL TRACTOR - SEMITRAILER  
COMBINATION



TRACTOR-DROMEDARY - SEMITRAILER  
COMBINATION

 *Accomplice™*



*Cubic Solutions Inc.*